

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

CAROLINE VEMULAPALLI,	)	
	)	
Plaintiff,	)	Case No.: 4:20-cv-120
	)	
v.	)	Removed from St. Louis City Circuit Court
	)	Case No.: 1922-CC12285
TARGET CORPORATION,	)	
	)	<b>JURY TRIAL REQUESTED</b>
Defendant.	)	

**NOTICE OF REMOVAL**

COMES NOW Defendant, TARGET CORPORATION, by and through its attorneys, BETH C. BOGGS and BOGGS, AVELLINO, LACH & BOGGS, L.L.C., pursuant to 28 U.S.C. § 1441 and 28 U.S.C. § 1446, and for its Notice of Removal, states to the Court as follows:

1. This action entitled Caroline Vemulapalli v. Target Corporation was commenced in the Circuit Court of the City of St. Louis on or about December 19, 2019.
2. The attached Petition for Damages was served upon Target Corporation on December 26, 2019.
3. Plaintiff is a resident of the State of Missouri, living in the City of St. Louis. See Petition, ¶ 1.
4. Defendant, Target Corporation, is a corporation organized under the laws of the State of Minnesota, with its principal place of business in Minneapolis, Minnesota. Therefore, Target Corporation is a citizen of the State of Minnesota.

5. Defendant asserts that complete diversity exists, as Defendant is a citizen of the State of Minnesota, for purposes of federal jurisdiction, and has its principal place of business in the State of Minnesota, and the Plaintiff is a citizen and resident of the State of Missouri. See 28 U.S.C. § 1332(c)(1).

6. This is an action over which this Court has original jurisdiction under the provisions of 28 U.S.C. § 1332, in that the matter in controversy, exclusive of interest and costs, exceeds the sum of \$75,000.00 and is between citizens of different states. Plaintiff claims injury from a sign falling upon her at the store. She claims that she has suffered injuries to her foot, toe, and nail, and well as mental anguish, fright and shock, denial of social pleasure and enjoyment, embarrassment, humiliation, and/or mortification, and past and future medical expenses and wage loss. She is also claiming disability. See Plaintiff's Petition, ¶ 13. Plaintiff's counsel has claimed that Plaintiff has suffered nerve damage as a result of the injury to her foot.

7. Copies of all processes, pleadings, Orders, records and proceedings in the City of St. Louis are attached to this Notice of Removal.

8. Defendant has filed this Notice of Removal within thirty (30) days after the service of the Petition, from which it was first ascertained that this case was removable.

WHEREFORE, Defendant, Target Corporation, respectfully requests that this Court acknowledge jurisdiction over this action and allow removal thereto to this Court for determination of all issues involved herein.

Respectfully submitted,


**TARGET CORPORATION**

By: /s/Beth C. Boggs  
Beth C. Boggs, #43089  
BOGGS, AVELLINO, LACH & BOGGS, L.L.C.  
9326 Olive Blvd., Suite 200  
St. Louis, MO 63132  
(314) 726-2310 Telephone  
(314) 726-2360 Facsimile  
[bboggs@balblawyers.com](mailto:bboggs@balblawyers.com)  
**Attorneys for Defendant**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing document was electronically filed with the Clerk of the U.S. District Court, Eastern District of Missouri, by using the Court's CM/ECF Electronic Filing System this 25th day of January, 2020, with an electronic copy to be served upon the following:

Matthew Ndonwi, #70273  
NDONWI LAW LLC  
4021 Laclede Ave., #56578  
St. Louis, MO 63156  
(314) 762-0110 – Telephone  
[mndonwi@ndonwilaw.com](mailto:mndonwi@ndonwilaw.com)  
**Attorney for Plaintiff**

  
\_\_\_\_\_  
Patricia A. Gorka